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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WEST. DIV. CINCINNATI

UNITED STATES OF AMERICA,
Plaintiff,

v.

DELOVE KOFI AMUZU,
a/k/a DE-LOVE KOFI AMUZU,
Defendant.

CASE NO. **1:22CR 010**

JUDGE **JUDGE BLACK**

INDICTMENT

18 U.S.C. § 1341

18 U.S.C. § 1343

18 U.S.C. § 1349

18 U.S.C. § 1956(a)(2)

18 U.S.C. § 1956(h)

Forfeiture Allegations

THE GRAND JURY CHARGES:

1. At times relevant to this Indictment, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, a citizen of Ghana, was a resident of the Southern District of Ohio.

COUNT 1
(Conspiracy to Commit Mail Fraud
and to Commit Wire Fraud)

The Conspiracy

2. Paragraph 1 of the Indictment is incorporated here.

3. From in or about August 2018 through on or about January 13, 2022, in the Southern District of Ohio and elsewhere, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, knowingly and intentionally conspired and agreed with others to commit the following offenses, that is:

- a. to devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations,

and promises, and for the purpose of executing the scheme and artifice, to knowingly cause items to be delivered by U.S. Mail and by private and commercial interstate carrier, in violation of Title 18, United States Code, Section 1341; and

- b. to devise and intend to devise a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice, to knowingly cause to be transmitted by means of wire communication in interstate commerce writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343.

Purpose and Object of the Conspiracy

4. The purpose and object of the conspiracy was for the coconspirators, including **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, to unlawfully enrich themselves by obtaining money and valuables by false and fraudulent pretenses.

Manner and Means of the Conspiracy

5. The manner and means by which the coconspirators, including **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, sought to accomplish the objectives of the conspiracy included the following:

6. As part of and in furtherance of the conspiracy, members of the conspiracy created profiles on dating websites using false information and pictures of other individuals (the “False Profiles”).

7. As part of and in furtherance of the conspiracy:

a. Members of the conspiracy used False Profiles to initiate contact with victims via the internet, pretending to be the person pictured in the False Profile.

b. Once members of the conspiracy initiated contact with a victim, they communicated with the victim by online instant messaging services, email, and telephone, among other ways. By expressing romantic interest in the victim, members of the conspiracy misled the victim into believing he or she was in a relationship with the person pictured in the False Profile.

c. Members of the conspiracy commonly represented to the victim that the person pictured in the False Profile was living abroad, or that there was some other justification for why the person pictured in the False Profile was never able to meet the victim in person.

d. Once the victim believed he or she was in a romantic relationship with the person pictured in the False Profile, members of the conspiracy made false representations to induce the victim to transfer money, or to mail money or valuables, to members of the conspiracy or to third parties, including to **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU** in the Southern District of Ohio and to other victims. For example, the coconspirators commonly falsely represented that the person pictured in the False Profile was expecting a large inheritance of gold bars and needed financial assistance to bring them to the United States. Other false representations the coconspirators made included that the person in the False Profile needed money for a plane ticket to visit the victim, money for bail after being falsely imprisoned, or money to pay medical bills. In fact, the money and valuables the victims sent to the coconspirators were used by individuals other than those pictured in the False Profiles and for purposes other than those represented to the victims.

e. Members of the conspiracy commonly directed victims to deposit checks, via counter deposit, into financial accounts controlled by members of the conspiracy.

f. Members of the conspiracy received proceeds of the scheme in multiple bank accounts, including bank accounts opened in the name of a shell company, Obdomdel

Management Agency LLC, an Ohio LLC for which **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU** was the registered agent.

g. Members of the conspiracy made misrepresentations to financial institutions about the purpose of the large deposits into the accounts controlled by the coconspirators.

h. Members of the conspiracy laundered the proceeds of the scheme by making large wire transfers, including to countries in Africa, and representing to financial institutions that the transfers were for, among other things, purchasing a house and supporting family members.

All in violation of 18 U.S.C. § 1349.

COUNTS 2-4
(Mail Fraud)

8. Paragraphs 1 and 4 through 7 of the Indictment are incorporated here.

9. From in or about August 2018 through on or about January 13, 2022, in the Southern District of Ohio and elsewhere, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, and others known and unknown to the grand jury, knowingly, and with the intent to defraud, devised and willfully participated in the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises.

10. On or about the following dates, in the Southern District of Ohio and elsewhere, for the purpose of executing the above-described scheme and artifice to defraud and deprive, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, knowingly caused the following matters to be delivered by mail, and by a private and commercial interstate carrier:

Count	Date, on or about	Matter mailed	Recipient
2	9/10/18	USPS Parcel	Delove Kofi Amuzu 11 Camelot Cir. Apt. J Fairfield, OH 45014
3	11/13/18	FedEx Parcel	Delove Kofi Amuzu 11 Camelot Cir. Apt. J Fairfield, OH 45014
4	12/10/18	USPS Parcel	[A.J.] [Redacted] Cincinnati, OH 45202

All in violation of 18 U.S.C. § 1341; *Pinkerton v. United States*, 328 U.S. 640

(1946).

COUNTS 5–6
(Wire Fraud)

11. Paragraphs 1 and 4 through 7 of the Indictment are incorporated here.

12. From in or about August 2018 through on or about January 13, 2022, in the Southern District of Ohio and elsewhere, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, and others known and unknown to the grand jury, knowingly, and with the intent to defraud, devised and willfully participated in the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises.

13. On or about the following dates, in the Southern District of Ohio and elsewhere, for the purpose of executing the above-described scheme and artifice to defraud and deprive, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, knowingly transmitted by means of wire communication in interstate commerce, and knowingly caused to be transmitted by means of wire communication in interstate commerce, the following writings, signs, signals, and pictures:

Count	Date, on or about	Wire Communication
5	12/10/18	Email to Wells Fargo with subject line "Re: ACTIVITY ON YOUR (NOW CLOSED) WELLS FARGO BUSINESS ACCOUNT"
6	12/20/19	Email to [redacted]@yahoo.co.uk reading "Text me for hangout bro [redacted]@gmail.com"

All in violation of 18 U.S.C. § 1343; *Pinkerton v. United States*, 328 U.S. 640 (1946).

COUNT 7
(Money Laundering Conspiracy)

14. Beginning in or about August 2018 and continuing through on or about January 13, 2022, in the Southern District of Ohio and elsewhere, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, knowingly and willfully conspired and agreed with others to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

- a. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, Mail Fraud in violation of 18 U.S.C. § 1341 and Wire Fraud in violation of 18 U.S.C. § 1343, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions

represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

- b. to transport, transmit, and transfer and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, that is, Mail Fraud in violation of 18 U.S.C. § 1341 and Wire Fraud in violation of 18 U.S.C. § 1343, in violation of Title 18, United States Code, Section 1956(a)(2)(A).

Manner and Means of the Conspiracy

15. The manner and means by which the coconspirators, including **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, sought to accomplish the objectives of the conspiracy included the following:

- a. Paragraphs 5 through 7 of the Indictment are incorporated here.
- b. It was further part of the conspiracy that members of the conspiracy, including **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, controlled a bank account at JPMorgan Chase Bank, N.A., with an account number ending in 5929 (the “Chase x5929 account”).
- c. It was further part of the conspiracy that members of the conspiracy, including **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, controlled a bank account at Bank of America in the name of Obdomdel Management Agency LLC, with an account number ending in 9130 (the “Bank of America 9130 account”).

- d. It was further part of the conspiracy that on August 27, 2018, members of the conspiracy caused a wire transfer for \$32,000 to be made from the Chase x5929 account to a bank account in Ghana, with the memo line "Family Expenses."
- e. It was further part of the conspiracy that on August 28, 2018, members of the conspiracy caused a wire transfer for \$29,700 to be made from the Chase x5929 account to a bank account in Ghana, with the memo line "Family Expenses."
- f. It was further part of the conspiracy that on November 9, 2018, members of the conspiracy caused a wire transfer for \$85,000 to be made from the Bank of America x9130 account to a bank account in Ghana, with the memo line "PURCHASE OF HOUSE."
- g. It was further part of the conspiracy that on November 20, 2018, members of the conspiracy caused a wire transfer for \$10,000 to be made from the Bank of America x9130 account to a bank account in Ghana, with the memo line "POP FAMILLY SUPPORT."
- h. It was further part of the conspiracy that on November 28, 2018, members of the conspiracy caused a wire transfer for \$12,000 to be made from the Bank of America x9130 account to a bank account in Ghana, with the memo line "POP FAMILY SUPPORT."
- i. It was further part of the conspiracy that on November 29, 2018, members of the conspiracy caused a wire transfer for \$20,000 to be made from the Bank of America x9130 account to a bank account in Ghana, with the memo line "POP FAMILY SUPPORT."

- j. It was further part of the conspiracy that on December 3, 2018, members of the conspiracy caused a wire transfer for \$33,000 to be made from the Bank of America x9130 account to a bank account in Ghana, with the memo line “POP FAMILY SUPPORT.”
- k. It was further part of the conspiracy that on December 6, 2018, members of the conspiracy caused a wire transfer for \$46,000 to be made from the Bank of America x9130 account to a bank account in Ghana, with the memo line “POP FAMILY SUPPORT.”

All in violation of 18 U.S.C. § 1956(h).

COUNTS 8–10
(Money Laundering)

16. On or about the dates listed below, in the Southern District of Ohio and elsewhere, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, did transmit and transfer funds, and cause funds to be transmitted and transferred, that is, the funds listed below, from a place in the United States to a place outside the United States, knowing that the funds involved in the transportation represented the proceeds of some form of unlawful activity and knowing that such transportation was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is, Mail Fraud in violation of 18 U.S.C. § 1341 and Wire Fraud in violation of 18 U.S.C. § 1343:

Count	Date, on or about	Transfer
8	8/27/18	Wire Transfer for \$32,000 from the Chase Bank Account with account number ending in 5929
9	8/28/18	Wire Transfer for \$29,700 from the Chase Bank Account with account number ending in 5929
10	11/9/18	Wire Transfer for \$85,000 from the Bank of America Account with account number ending in 9130

In violation of 18 U.S.C. §§ 1956(a)(2)(B); *Pinkerton v. United States*, 328 U.S. 640 (1946).

FORFEITURE ALLEGATION 1

Upon conviction of any offense set forth in Counts 1 through 6 of this Indictment, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation(s), including but not limited to a sum of money equal to the amount of proceeds the defendant obtained as a result of the offense(s).

FORFEITURE ALLEGATION 2

Upon conviction of any offense set forth in Counts 7 through 10 of this Indictment, the defendant, **DELOVE KOFI AMUZU a/k/a DE-LOVE KOFI AMUZU**, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense(s), and any property traceable to such property, including but not limited to a sum of money equal to the amount of money involved in the offense(s).

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the defendant, up to the value of the property described above.

A TRUE BILL.

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FOREPERSON

KENNETH L. PARKER
UNITED STATES ATTORNEY


JULIE D. GARCIA
Assistant United States Attorney